

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

| | | |
|--|---|----------------------------------|
| <hr/> | | X |
| THE CITY OF EDINBURGH COUNCIL ON | : | Civil Action No. 07-cv-09921 |
| BEHALF OF THE LOTHIAN PENSION | : | |
| FUND, On Behalf of Itself and All Others | : | <u>CLASS ACTION</u> |
| Similarly Situated, | : | |
| | : | NOTICE OF MOTION FOR |
| Plaintiff, | : | APPOINTMENT AS LEAD PLAINTIFF |
| | : | AND FOR APPROVAL OF SELECTION OF |
| vs. | : | LEAD COUNSEL |
| | : | |
| VODAFONE GROUP PUBLIC LIMITED | : | |
| COMPANY, et al., | : | |
| | : | |
| Defendants. | : | |
| <hr/> | | X |

PLEASE TAKE NOTICE that Institutional Investor The City of Edinburgh Council on Behalf of the Lothian Pension Fund (“The City of Edinburgh Council”) will hereby move this Court, on a date and at such time as may be designated by the Court, for an Order (attached hereto as Exhibit A): (i) appointing The City of Edinburgh Council as Lead Plaintiff; (ii) approving The City of Edinburgh Council’s selection of the law firm of Coughlin Stoia Geller Rudman & Robbins LLP to serve as Lead Counsel; and (iii) granting such other and further relief as the Court may deem just and proper. In support of this Motion, The City of Edinburgh Council submits herewith a Memorandum of Law and Declaration of David A. Rosenfeld, dated January 14, 2008.

DATED: January 14, 2008

COUGHLIN STOIA GELLER
RUDMAN & ROBBINS LLP
SAMUEL H. RUDMAN
DAVID A. ROSENFELD

/s/ David A. Rosenfeld
DAVID A. ROSENFELD

58 South Service Road, Suite 200
Melville, NY 11747
Telephone: 631/367-7100
631/367-1173 (fax)

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I, David A. Rosenfeld, hereby certify that on January 14, 2008, I caused a true and correct copy of the attached:

Notice of Motion for Appointment as Lead Plaintiff and for Approval of Selection of Lead Counsel;

Memorandum in Support of the Motion of the City of Edinburgh Council on Behalf of the Lothian Pension Fund for Appointment as Lead Plaintiff and for Approval of Selection of Lead Counsel; and

Declaration of David A. Rosenfeld in Support of the Motion of the City of Edinburgh Council on Behalf of the Lothian Pension Fund for Appointment as Lead Plaintiff and for Approval of Selection of Lead Counsel,

to be served: (i) electronically on all counsel registered for electronic service for this case; and (ii) by first-class mail to any additional counsel.

/s/ David A. Rosenfeld

David A. Rosenfeld

VODAFONE 07

Service List - 1/10/2008 (07-0242)

Page 1 of 1

Counsel For Defendant(s)

Theodore Edelman
Sullivan & Cromwell LLP
125 Broad Street
New York, NY 10004-2498
212/558-4000
212/558-3588(Fax)

Counsel For Plaintiff(s)

Samuel H. Rudman
David A. Rosenfeld
Coughlin Stoia Geller Rudman & Robbins LLP
58 South Service Road, Suite 200
Melville, NY 11747
631/367-7100
631/367-1173(Fax)